1 2 3 5 7 UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA 8 ACCU CLEAN LLC. No. 1:12-CV-129 JCC/IDD 9 Plaintiff, ANSWER AND AFFIRMATIVE 10 v. 11 AMAZON CORPORATE LLC, d/b/a AMAZAN.COM [sic], 12 13 Defendant. 14 Amazon Corporate LLC ("Amazon") answers the Complaint as follows: 15 1. Amazon lacks information sufficient to form a belief as to the truth of the 16 allegations set forth in Paragraph 1 of the Complaint and therefore denies the same. 17 2. Amazon lacks information sufficient to form a belief as to the truth of the 18 allegations set forth in Paragraph 2 of the Complaint and therefore denies the same. 19 Amazon denies that it is a corporation organized under the laws of the State of 3. 20 Washington. 21 4. Amazon admits that the parties entered into a contract for janitorial services. The 22 contract, attached to the Complaint, speaks for itself. Amazon denies any attempt to 23 mischaracterize the terms of the contract. 24 5. Amazon lacks information sufficient to form a belief as to the truth of the 25 allegations set forth in Paragraph 5 of the Complaint and therefore denies the same. 26

ANSWER AND AFFIRMATIVE DEFENSES - 1

1	6.	Amazon lacks information sufficient to form a belief as to the truth of the	
2	allegations set forth in Paragraph 6 of the Complaint and therefore denies the same.		
3	7.	Amazon admits that it contacted Accu Clean LLC in July and September 2008	
4	regarding a re	eview of its disbursement process. Amazon's correspondence, attached to the	
5	Complaint, speaks for itself. Amazon denies the remaining allegations contained in Paragraph 7		
6	of the Complaint.		
7	8.	Amazon lacks information sufficient to form a belief as to the truth of the	
8	allegations set forth in Paragraph 8 of the Complaint and therefore denies the same.		
9	9.	Amazon lacks information sufficient to form a belief as to the truth of the	
10	allegations se	et forth in Paragraph 9 of the Complaint and therefore denies the same	
11	10.	The allegations contained in Paragraph 10 of the Complaint constitute a legal	
12	conclusion to which no response is required. To the extent a response is required, Amazon		
13	denies the allegations contained in Paragraph 10 of the Complaint.		
14	Count I: Breach of Contract		
15	11.	The allegations contained in Paragraph 11 of the Complaint constitute a legal	
16	conclusion to which no response is required. To the extent a response is required, Amazon		
17	denies the allegations contained in Paragraph 11 of the Complaint.		
18		AFFIRMATIVE DEFENSES	
19	By way of further answer and as affirmative defenses, Amazon alleges as follows:		
20	1.	The Complaint fails to state a claim upon which relief can be granted.	
21	2.	Plaintiff's claims are barred, either in whole or in part, by the equitable doctrines	
22	of estoppel and/or unclean hands.		
23	3.	Even if Plaintiff were entitled to judgment, which it is not, Plaintiff is not entitled	
24	to recovery of attorney's fees and costs.		
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1	RESERVATION				
2	Amazon reserves the right to add defenses and affirmative defenses, to add counterclaims				
3	and third-party defendants, and to argue legal theories in addition to or in lieu of those.				
4	Dated this 28th day of February, 2012	Respectfully Submitted,			
5		AMAZON CORPORATE LLC, d/b/a AMAZAN.COM [sic]			
6		By Counsel			
7	/s/ Daniel Poretz				
8	Daniel Poretz				
9	Virginia Bar No. 71372 King, Campbell & Poretz, PLLC				
10	108 North Alfred Street				
11	Alexandria, Virginia 22314 Tele: 703.683.7070				
	Fax: 703.652.6010				
12	Email: <u>inakingcampbeil.com</u>				
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ANSWER AND AFFIRMATIVE DEFENSES - 3

1	CERTIFICATE OF SERVICE				
2	I hereby certify that on this 28th day of February 2012, a true copy of the foregoing was				
3	filed electronically with the clerk of the court using the CM/ECF system which will send				
4	notifications of such filing to the following:				
5	Fred M. Rejali				
6	Virginia Bar No. 38127 8300 Greensboro Drive, Suite 800 McLean, Virginia 22314				
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8	Counsel for Defendant				
9		//D-:1D			
10		/s/ Daniel Poretz			
11		Daniel Poretz Virginia Bar No. 71372			
12		King, Campbell & Poretz, PLLC 108 North Alfred Street			
13 14		Alexandria, Virginia 22314 Tele: 703.683.7070			
15		Fax: 703.652.6010 Email: dan@kingcampbell.com			
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ANSWER AND AFFIRMATIVE DEFENSES - 4